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8

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA, SOUTHERN DIVISION

11 \*\*\*

12 MARIAH MAAS, as Special Administrator  
for the Estate of Tiffany Slatsky, MARTIN  
13 SLATSKY, as parent and legal guardian of  
CADE SLATSKY, a minor,

14 Plaintiffs,

15 vs.

16 CHRISTOPHER CANDITO, an individual,  
17 ANDREW CLAPPER, an individual,  
NICHOLAS ROBISON, an individual,  
18 ANDREW STOCKER, an individual, CITY  
OF NORTH LAS VEGAS, a municipality;  
19 DOE DEFENDANTS I through XX, and ROE  
CORPORATIONS I through X, inclusive,  
20

21 Defendants.  
22

CASE NO. 2:22-cv-568-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE TO FILE  
DISPOSITIVE MOTIONS**

**FIRST REQUEST**

23 Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of  
24 record, hereby stipulate and request that this Court extend the deadline to file dispositive motions  
25 in the above-captioned case sixty-two (62) days, up to and including Monday, April 28, 2025.

26 This Request for an extension of time is not sought for any improper purpose or other  
27 purpose of delay. This request for extension is based upon the following:

28 The parties seek additional time to file dispositive motions for several reasons, none of

1 which are for an improper purpose or for the purpose of delay. Counsel for CNLV Defendants is  
 2 currently preparing for multiple, multi-day long Rule 30(b)(6) depositions in the matter entitled,  
 3 *Hollingsworth v. CNLV, et al.*, Case No. 2:21-cv-2230-CDS-NJK. In addition, Lead Counsel for  
 4 CNLV Defendants is attending to family obligations involving medical issues over the next few  
 5 months that will continue to require him to be out of the jurisdiction for extended periods of time.  
 6 The obligation is unavoidable. Additionally, lead counsel has oral argument set in *Padilla v. City*  
 7 *of North Las Vegas*, Case No. 23-3265 in the Ninth Circuit Court of Appeals on April 10, 2025.

8 Plaintiffs' counsel will be attending the United States District Court – District of Nevada  
 9 annual conference in Reno, Nevada from May 6, 2025 through May 8, 2025. Additionally,  
 10 Plaintiffs' counsel will be attending a legal conference in Ojai, California from February 27, 2025  
 11 through March 2, 2025, as well as preparing for a Ninth Circuit Appellate Court argument in the  
 12 case of *Pattison v. Benson, et al.*, Case No. 23-15870 on March 6, 2025.

13 WHEREFORE, the parties respectfully request that this Court extend the time for the  
 14 parties to file their dispositive motions by ninety (91) days from the current deadline of February  
 15 25, 2025 up to and including May 27, 2025.

16 **IT IS SO STIPULATED AND AGREED.**

17 Dated this 3<sup>rd</sup> day of February, 2025.

Dated this 3<sup>rd</sup> day of February, 2025.

18 LEWIS BRISBOIS BISGAARD & SMITH LLP

LAGOMARSINO LAW

19 /s/ Robert W. Freeman

/s/ Andre M. Lagomarsino

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DATED this 3<sup>rd</sup> day of February, 2025.

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DATED this 3<sup>rd</sup> day of February, 2025.

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DATED this 3<sup>rd</sup> day of February, 2025.

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DATED this 3<sup>rd</sup> day of February, 2025.

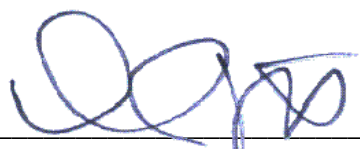
**CHRISTOPHER CANDITO**

/s/ Christopher Candito  
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5309 North Campbell Road  
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*Pro Se*

**ORDER**

IT IS SO ORDERED.

DATED: 2/4/2025

  
UNITED STATES MAGISTRATE JUDGE